

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No.	23cr10019
)		
v.)	Violations:	
)		
ZAIRE AQUIL LODGE,)	<u>Counts One - Three:</u>	Sexual Exploitation of
)	Children	
Defendant)	(18 U.S.C. §§ 2251(a) and (e))	
)		
)	<u>Count Four:</u>	Receipt of Child Pornography
)	(18 U.S.C. § 2252A(a)(2)(A))	
)		
)	<u>Forfeiture Allegation:</u>	
)	(18 U.S.C. § 2253)	

INDICTMENT

COUNT ONE

Sexual Exploitation of Children
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury charges:

On or about February 24, 2021, in the District of Massachusetts, and elsewhere, the defendant,

ZAIRE AQUIL LODGE,

employed, used, persuaded, induced, enticed, and coerced a minor, “Minor A” (YOB 2006), to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and attempted to do so, and knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer, and the visual depiction was actually transported and transmitted using any means and facility of interstate and

foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO
Sexual Exploitation of Children
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates between on or about August 2, 2021, and on or about August 13, 2021, in the District of Massachusetts, and elsewhere, the defendant,

ZAIRE AQUIL LODGE,

employed, used, persuaded, induced, enticed, and coerced a minor, “Minor B” (YOB 2005), to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and attempted to do so, and knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer, and the visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT THREE
Sexual Exploitation of Children
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates between on or about June 16, 2021 and on or about October 28, 2021, in the District of Massachusetts, and elsewhere, the defendant,

ZAIRE AQUIL LODGE,

employed, used, persuaded, induced, enticed, and coerced a minor, “Minor C” (YOB 2005), to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and attempted to do so, and knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer, and the visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT FOUR
Receipt of Child Pornography
(18 U.S.C. § 2252A(a)(2)(A))

The Grand Jury further charges:

On various dates between on or about February 24, 2021, and on or about October 28, 2021, in the District of Massachusetts, and elsewhere, the defendant,

ZAIRE AQUIL LODGE,

knowingly received, and attempted to receive, any child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and using any means and facility of interstate and foreign commerce and had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

CHILD EXPLOITATION/CHILD PORNOGRAPHY FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

The Grand Jury further finds:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 2251 and 2252A, set forth in Counts One through Four, the defendant,

ZAIRE AQUIL LODGE,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

a. Samsung Note 9 cell phone, model: SM-N960U, Serial: RFK8K81889GH

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant--

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the Court;


d. has been substantially diminished in value; or

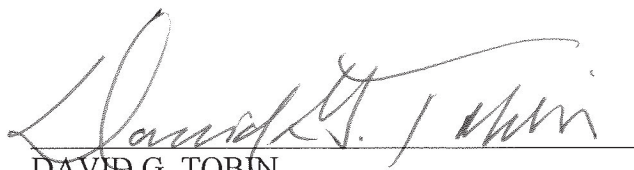
e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.


All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL


FOREPERSON


DAVID G. TOBIN
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: JANUARY 19, 2023
Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK